

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CITY OF ROSEVILLE EMPLOYEES'	:
RETIREMENT SYSTEM, et al.,	:
	:
Plaintiffs,	:
	:
vs.	:
	:
ENERGY <i>SOLUTIONS</i> INC., R. STEVE	:
CREAMER, PHILIP O. STRAWBRIDGE, JEAN I.	:
EVEREST, II, MARK C. MCBRIDE, ALAN E.	:
GOLDBERG, JORDAN W. CLEMENTS, LANCE	:
L. HIRT, ROBERT D. LINDSAY, E. GAIL DE	:
PLANQUE, ROBERT J.S. RORISTON, ANDREW	:
S. WEINBERG, DAVID B. WINDER, CREDIT	:
SUISSE SECURITIES (USA) LLC, J.P. MORGAN	:
SECURITIES INC., MORGAN STANLEY & CO.	:
INC. and ENV HOLDINGS, LLC,	:
	:
Defendants.	:
	:
	:
	:
-----X	

Civil Action No. 1:09-cv-08633-JGK

**NOTICE OF MOTION TO DISMISS THE  
CONSOLIDATED AMENDED COMPLAINT**

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law, the Declaration of Jonathan K. Youngwood, dated June 18, 2010, and the exhibits attached thereto, defendants Energy*Solutions*, Inc. (“Energy*Solutions*”), ENV Holdings, LLC (“ENV”), R. Steve Creamer, Philip O. Strawbridge, Jean I. Everest, II, Mark C. McBride, Alan E. Goldberg, Jordan W. Clements, Lance L. Hirt, Robert D. Lindsay, E. Gail De Planque, Robert J.S. Roriston, Andrew S. Weinberg, David B. Winder (collectively, the “Individual Defendants”), Credit Suisse Securities (USA) LLC, J.P. Morgan Securities Inc. and Morgan Stanley & Co. Inc. (collectively, the “Underwriter Defendants”), by and through their

undersigned attorneys, will move this Court, before the Honorable John G. Koeltl, United States District Judge, at the United States District Courthouse, 500 Pearl Street, New York, NY 10007, on a date and time to be set by the Court, for an order, under Fed. R. Civ. P. 9(b) and 12(b)(6), dismissing the Consolidated Amended Complaint with prejudice.

Dated: New York, New York  
June 18, 2010

Respectfully submitted,

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